

Public Comment submitted by George Allen, March 27, 2019.

Good morning. I am a former member of CASAC, a member of the disbanded PM Review Panel, and a signatory on Dr. Frey's comment letter submitted for this meeting. My comments today do not necessarily represent the views of my employer NESCAUM or NESCAUM member states.

First, I would like to acknowledge EPA ORD and SAB staff for their efforts on this review under unprecedented circumstances. By redefining the causality framework between air pollutants and health effects, this CASAC has put EPA staff in a difficult situation. The first paragraph of the Science Magazine Policy Forum article posted online a week ago concludes with this:

<< The agency now faces a dilemma. If EPA leadership embraces the process proposed by the current CASAC chair, it will fundamentally change EPA's process for scientific assessment. If EPA leadership ignores the CASAC recommendations, then the agency would be declining to listen to (what should be) its top science advisors. >> [end quote]

These are ugly choices, but if CASAC's draft ISA review letter is finalized without major changes to its core conclusions, EPA should ignore CASAC's flawed recommendations. I encourage all CASAC members to read this open access Policy Forum piece* and ask themselves if they want to continue to be part of this review process if it goes forward in its current corrupted form.

CASAC should request that the PM Panel should be restored. This CASAC is unqualified to perform this review alone in a manner that fulfills the Clean Air Act requirements, leaving the review vulnerable to legal challenges. The CASAC realizes this; some members have called for restoration of the panel, while others have suggested that some kind of limited additional expertise be requested. The administrator's choice to disband the panel is clearly aimed at weakening the review process, since although the panel supplies essential and diverse expertise to CASAC, by statute and charter only CASAC members can formally advise the EPA. CASAC should refrain from providing advice outside of its areas of competence until the PM panel is reinstated.

Lack of CASAC consensus on some chapters of the draft ISA is noted in the response to charge questions, but not clearly carried forward into the letter. The summary letter should reflect dissenting views, not just those of the majority. If members are not satisfied with how dissenting views are presented, I would encourage them to not approve the letter at the end of today's meeting. It is unclear if only a simple majority of CASAC members are required for approval of a letter - that is a question for EPA.

* <http://dx.doi.org/10.1126/science.aaw9460>